

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

HMK ENTERPRISES, INC.,  
ROBERT ACKERMAN and  
STEVEN KAROL.

Plaintiffs,

**y.**

THE CHUBB CORPORATION and  
FEDERAL INSURANCE COMPANY

Defendant.

) Civil Action No. 04-12688-MLW

**JOINT MOTION TO CONTINUE SCHEDULING CONFERENCE**

Now come HMK Enterprises, Inc., Robert Ackerman and Steven Karol ("Plaintiffs") and The Chubb Corporation and Federal Insurance Company ("Defendants") and jointly move to continue the scheduling conference until either October 6, 2005 or October 7, 2005, stating as follows:

- (1) Pursuant to notice from the Court, a scheduling conference in the above matter has been calendared to occur at 2:00 p.m. on September 20, 2005.
- (2) Counsel for Defendants regrettably is unable to attend the scheduled conference and has contacted all other counsel to request that they join in this motion to continue same until a mutually convenient date.
- (3) Following the parties' conference to determine one or more mutually convenient dates, the parties agreed to seek leave of this Court jointly to continue the scheduling conference until either October 6, 2005 or October 7, 2005.
- (4) The parties submit that the relief requested herein will not prejudice either party or the Court.

WHEREFORE, the parties respectfully request that the Court grant their joint motion to continue the scheduling conference until either October 6, 2005 or October 7, 2005.

**Plaintiffs,**

**HMK Enterprises,  
Robert Ackerman and  
Steven Karol**

By Their Attorneys,

/s/ Howard M. Cooper /LMH  
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**Defendants,**

**The Chubb Corporation and  
Federal Insurance Company**

By Their Attorneys,

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Dated: September 9, 2005